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August 23, 1996

BY HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

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AUG 23 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: Implementation of the Pay Telephone Reclassification
and Compensation Provisions of the Telecommunications
Act of 1996, CC Docket No. 96-128

Dear Mr. Caton:

The attached document responds to questions raised by members of the Enforcement Division regarding RBOC data that was presented during a workshop.

Please include the attached materials in the record of the above-captioned proceeding. Any questions concerning this matter should be directed to me at the above-noted address or telephone number.

Sincerely,

Michael K. Kellogg
Michael K. Kellogg

cc: Michael Carowitz
Rose Crellin
Glenn Reynolds
Tom Zagorsky

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

**RBOC Payphone Coalition Ex Parte Concerning
Distribution of Calls from RBOC Payphones**

August 23, 1996

In response to questions raised by the staff, the members of the RBOC Coalition have attempted to estimate the average number of calls per payphone per month, the number of 1-800 subscriber calls per payphone per month, and the number of access code calls per payphone per month. For purposes of this document, the Coalition uses the term "1-800 subscriber" to refer to commercial 1-800 calls (such as 1-800-FLOWERS) and the term "access code" to refer to dial-around calls used to reach a carrier (such as 10XXX, 950, and 1-800-CALLATT).

These estimates were difficult to derive, and many are based on limited samples. To avoid the distortion that would result from basing total call volumes on sampling, total call volumes are based on aggregate 1995 data for all payphones. The breakdown between 1-800 subscriber calls and access code calls, however, is based on each RBOC's best attempt to identify the call mix. Finally, I should point out that the data is confidential in nature. Accordingly, the data is presented without directly identifying the Coalition member from which it came.

RBOC "A" averaged approximately 550 calls per payphone per month in 1995. Based on a limited sampling of "smart" phones, RBOC "A" estimates that 20 percent of its calls -- or 110 calls per month -- are either 1-800 subscriber or access code calls. Of those 110 calls, approximately 75 percent (or 83 calls per month) are 1-800 subscriber calls, and 25 percent (or 27 calls) are access code calls.

RBOC "B" averaged approximately 517 calls per payphone per month in 1995. Based on a limited sampling of "smart" phones, RBOC "B" estimates that 23 percent (or 119 calls per month) are either access code or 1-800 subscriber calls. RBOC "B" further estimates that, of those 119 calls, 70 percent (83 calls per month) are 1-800 subscriber calls, and the remaining 30 percent (36 calls per month) are access code calls.

RBOC "C" averaged approximately 445 calls per payphone per month in 1995. RBOC "C" was not able to conduct any sampling. However, RBOC "C" estimates that, of those 445 calls, approximately 42 percent (or 187 calls per month) are either access code or 1-800 subscriber calls. RBOC "C" believes that, of those 187 calls per month, about 56 percent (or 105 calls per month) are subscriber 800 calls, and the remaining 44 percent (or 82 calls per month) are access code calls.

RBOC "D" averaged about 445 calls per phone per month in 1995. RBOC "D" estimates that 36 percent of these calls -- or a total of 160 calls per month -- are 1-800 subscriber or access code calls. Based on limited sampling, RBOC "D" also attempted to estimate how many of the 1-800 calls were 1-800 subscriber calls, and how many were 1-800 access calls (e.g., 1-800-CALLATT). RBOC "D" estimated that half of all 1-800 calls (77 calls) are 1-800 subscriber calls, and half (77 calls) are 1-800 access calls. Consequently, RBOC "D" estimates that 77 calls per phone per month are 1-800 "subscriber" calls, and 83 calls per phone per month are access code calls (such as 1-800 access, 950, and 10XXX).

RBOC "E" averaged about 480 calls per phone per month in 1995. Based on a limited sampling, RBOC "E" estimates that approximately 26 percent of those 480 calls (or 125 calls per phone per month) are 1-800 subscriber or access code calls. RBOC "E" was not able to distinguish between 1-800 subscriber and 1-800 access code calls. RBOC "E" estimates that about 24 percent of its calls (115 calls per month) are 1-800 calls of some variety, and that 2 percent (10 calls per month) are 10XXX or 950 access code calls.

Finally, RBOC "F" averaged about 488 calls per payphone per month in 1995. Based on a limited sample, RBOC "F" estimates that about 83 calls per phone per month (roughly 17 percent) were either 1-800 subscriber calls or access code calls. RBOC "F" further estimates that 52 of those calls (or 63 percent) are 1-800 subscriber calls, and 31 of those calls (or 37 percent) are access code calls.

A summary chart is attached.

Estimated Payphone Call Distribution

RBOC	Avg. Calls/ Phone/Month	1-800 and Access Code Calls	1-800 Subscriber Calls (e.g., 1-800-FLOWERS)	Access Code Calls (e.g., 1-800-CALLATT, 950, 10XXX)
RBOC "A"	550	110	83	27
RBOC "B"	517	119	83	36
RBOC "C"	445	187	105	82
RBOC "D"	445	160	77	83
RBOC "E"	480	125	--	--
RBOC "F"	488	83	52	31